

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America
v.
Jordon Switzer

Case: 2:21-mj-30030
Assigned To : Unassigned
Assign. Date : 1/15/2021
CMP: SEALED MATTER (MAW)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 2019 through September 27, 2019 in the county of Oakland and elsewhere in the
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 USC § 2252A(a)(2)	Receipt of child pornography
18 USC §§ 2251(a) and (e)	Production and attempted production of child pornography
18 USC § 2422(b)	Online enticement of a minor to engage in unlawful sexual activity

This criminal complaint is based on these facts:
see attached affidavit.

Continued on the attached sheet.

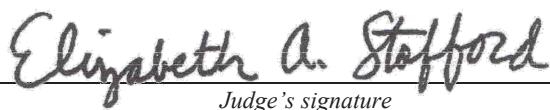

Complainant's signature

Amy M. Hirina, Special Agent (FBI)
Printed name and title

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: January 15, 2021

City and state: Detroit, Michigan


Judge's signature

Hon. Elizabeth A. Stafford, United States Magistrate Judge
Printed name and title

AFFIDAVIT

I, Amy Hirina, a Special Agent (SA) with the Federal Bureau of Investigation (FBI), Detroit Division, being duly sworn, depose and state as follows:

I. INTRODUCTION

1. I have been employed as a Special Agent of the FBI since 2005, and am currently assigned to the FBI Detroit Division, Oakland County Resident Agency. While employed by the FBI, I have investigated federal criminal violations involving the online sexual exploitation of children. I have gained experience through training at the FBI Academy, post Academy training, and everyday work related to conducting these types of investigations.
2. As a federal agent, I am authorized to investigate violations of laws of the United States and to execute arrest warrants issued under the authority of the United States.
3. This affidavit is made in support of an application for a criminal complaint and arrest warrant for JORDON SWITZER (DOB 02/XX/1991) for violations of 18 U.S.C. § 2252A(a)(2) (Receipt of Child Pornography), 18 U.S.C. § 2251(a) and (e) (Production and Attempted Production of Child Pornography), and 18 U.S.C. § 2422(b) (Online Enticement).

II. PROBABLE CAUSE

4. On September 27, 2019, the Wixom Police Department contacted the FBI to report a complaint they received regarding sextortion of a 15-year-old female minor victim (MV), date of birth February 2004.
5. MV reported in or about November 2018, when MV was 14 years old, she began selling nude photographs and videos of herself using a fake name (Amelia Stugo). MV found buyers on the social media application Kik, and MV received payments through Paypal, Venmo, and Cash app.
6. On or about September 19, 2019, MV was contacted on Snapchat by username “MVnudes”¹/screen name “MV Family See Your Nudes” (where the screen name and username depicted MV’s true name.) The following messages occurred between September 19, 2019, and September 27, 2019, between MV (true identity account) and username “MVnudes:”

NOTE:	<i>Snapchat messages are only available for a short period of time, thus, the below Snapchat messages were documented with photographs taken of MV’s phone by the school social worker. The messages may not be in chronological order when a “break in conversation” is denoted.</i>
MV	how do you know about [school name] how do you know where i go to school how do you know all of this
MVnudes	Well youd have less reason to be if i had a list of your buyers

¹ The Snapchat username and screen name contain MV’s true identity. “MV” is being used in place of MV’s name.

MV	do you know where i live or not <i>[break in conversation]</i>
MVnudes	Listen I'm just giving you info here. If someone else gets your stuff and your info and your friends/familys info they wont ask multiple times or maybe even at all They'll just send and harass for their own entertainment. They do it all the time.
MV	so whats the difference? that makes you the good guy here? I don't think so
MVnudes	Im just saying if youre annoyed now you'll hate what happens in the future <i>[break in conversation]</i>
MVnudes	I have a sort of drop box with all your stuff made. Took me a bit to get it all together.
MV	and then?
MVnudes	If i tell you, you won't be surprised.
MV	you're just gonna send it to people?
MVnudes	That wouldn't be effective
MV	so?
MVnudes	Sharing it would be easier to a wide audience at once Also sharing it to the internet makes it so other people do the work for me. <i>[break in conversation]</i>
MVnudes	Make one
MV	what why
MVnudes	So i go away
MV	what does that mean
MVnudes	Means i stop "bothering" you. And none of your fears of things spreading stop None of your fears happen i mean.
MV	i thought you wanted a list
MVnudes	You're not giving it to me.
MV	what makes you think ill get you a sex video?
MVnudes	So now I escalate. Or maybe you prefer this idk. <i>[break in conversation]</i>

MVnudes	When can you get he video
MV	I have no idea
MVnudes	Who will you make it with
MV	what I have no idea
MVnudes	A buyer or school friend?
MV	idk this isn't like an easy task
MVnudes	Why You didnt do your easy task Its not hard. Find a horny teenage boy, or get one of your many buyers. You have so many options.
MV	my buyers dont live around here and im not having sex with someone at school
MVnudes	Why not And im sure atleast one of your buyers is in range and owns a car or ability to fly Reach out and ask them. And show me proof you asked so I know you made an effort
MV	i don't know if i can do that
MVnudes	Why
MV	im underage first of all i dont want to have sex with some stranger
MVnudes	You sell videos you can make another one Sounds like you don't want to have sex with anyone
MV	i don't
MVnudes	Want me to scout and see who thinks you're hot?

Identifying JORDON SWITZER (SUBJECT PERSON)

7. The FBI subpoenaed Snapchat for subscriber and IP information related to the Snapchat username “MVnudes.” On or about October 15, 2019, Snapchat responded to an administrative subpoena seeking information for

Snapchat username “MVnudes” with the following information:

Email address: faith.park16@hotmail.com
Created: September 13, 2019
Login: 09/22/2019, 22:58:29 UTC,
IP address: 2600:6c40:380:3000:ed31:d7dd:e912:7c00

8. An open source search indicated that IP address

2600:6c40:380:3000:ed31:d7dd:e912:7c00 was assigned to internet service provider Spectrum (Charter Communications).

9. On or about October 15, 2019, Charter Communications responded to an

administrative subpoena seeking information for IP address

2600:6c40:380:3000:ed31:d7dd:e912:7c00. On September 22, 2019, IP address 2600:6c40:380:3000:ed31:d7dd:e912:7c00 was assigned to subscriber Jordon Switzer at an apartment in Maryland Heights, Missouri.

10. On or about November 25, 2019, a search warrant was executed at the

residence of Jordon Switzer in Maryland Heights, Missouri. Electronics were seized, to include a “Cool Master” computer tower.

11. A review of the “Cool Master” computer tower revealed the below files:

Path: \Users\Jordon\Desktop\Kik\“MV true name” - Amelia Stugo Feb 2004\“MV true name”-HLB Upload

File Name: Screenshot_20190703-195825.png

The above file is a screenshot of a Kik account for screenname “amelia [do NOT pm unless buying]/username: “ameliastugo1.” The screenshot displays “132 Days on Kik” and MV is in the profile picture.

Path: \Users\Jordon\Desktop\Kik\MV true name" - Amelia Stugo Feb 2004\Kik

File Name: Screenshot_20190702-173449.png

The above file is a screenshot of a Kik conversation with "amelia [do NOT pm unless buying].

amelia - of course! the prices are negotiable. im 15

amelia - [photograph attached of an advertisement offering premade pictures, custom pictures, cam, and sexting, with prices.]

outgoing - Can you prove ag

outgoing - Age

outgoing - If so im interested

ameila - yes i have a school id

Path: \Users\Jordon\Desktop\Kik\MV true name" - Amelia Stugo Feb 2004\Kik

File Name: Name_Screenshot_20190702-130250.png

The above file is a screenshot of a Kik conversation with "amelia [do NOT pm unless buying].

amelia - ["Camera"²] photograph sent of a hand holding a school identification. MV is pictured on the school identification.]

amelia - it says 009 which was my grade last year

outgoing - Ok

outgoing - Payment method?

Path: \Users\Jordon\Desktop\Kik\MV true name" - Amelia Stugo Feb 2004\Kik

File Name: Screenshot_20190703-214958.png

The above file is a screenshot of a Kik conversation with "amelia [do NOT pm unless buying].

outgoing - doggy style hands spreading cheeks

outgoing - And what's your snap btw

amelia - astugo5

amelia - and yes, is it okay if i do one hand? i need one to hold my phone haha.

outgoing - Okay

amelia - ["Camera" photograph sent of a female spreading their buttocks with one hand, and displaying their genitals.]

outgoing - Can I get full body

² "Camera" is denoted under a photograph on Kik when a live/new picture or video is captured.

Path: \Users\Jordon\Desktop\Kik\”MV true name” - Amelia Stugo Feb 2004\FacebookPhotos

File Name: Screenshot_20190905-155546.png

The above file is a screenshot of MV’s true identity Facebook profile displaying her true name and photograph.

12. Images of MV were observed in the review of the electronics, to include, images that meet the federal definition of child pornography.

III. CONCLUSION

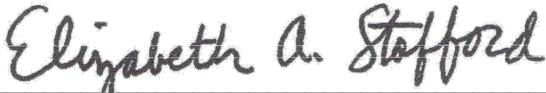
13. Your Affiant believes that probable cause exists that Jordon Switzer (DOB 02/XX/1991) violated 18 U.S.C. § 2252A(a)(2) (Receipt of Child Pornography), 18 U.S.C. § 2251(a) and (e) (Production and Attempted Production of Child Pornography), and 18 U.S.C. § 2422(b) (Online Enticement).

Respectfully submitted,



Amy M. Hirina, Special Agent
Federal Bureau of Investigation

Sworn to before me and signed in my presence and/or by reliable electronic means.



Hon. Elizabeth A. Stafford

United States Magistrate Judge

Date: January 15, 2021